

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

VINCENT HANDSFORD,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE NO.
)	1:19-cv-05746-JPB-RDC
SHERIFF VICTOR HILL, in his official)	
capacity,)	
)	
Defendant.)	

AMENDED DISCOVERY PLAN

Pursuant to this Court’s Order [Doc. 90] as well as Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.2 for the United States District Court for the Northern District of Georgia, and based upon the information reasonably available to the Parties at this time, the Parties by and through their respective counsel hereby file the following Amended Discovery Plan. The Parties conferred via telephone conference on February 15, 2023, and agree on the following matters:

The parties request three months to complete the remaining discovery in this matter, at which point discovery will end. This request comes after a nearly two-year stay of these proceedings following this Court’s Orders referring this matter to mediation [Docs. 73, 84] and administratively closing this case pending resolution

of criminal and civil matters involving Sheriff Victor Hill [Doc. 75].

Since April 2021 when the Parties were last engaged in active discovery in this case, there have been significant personnel changes in the leadership of the Clayton County Sheriff's Office, as well as a change in lead counsel for Defendant in this matter. Because of this, the Parties require an additional three months to complete discovery, taking into consideration the number of remaining witness depositions. Additionally, counsel for both Parties are engaged in active discovery in other matters before this Court, and have previously planned vacations scheduled in April.

Given the length of time since this matter was in active discovery, the Parties anticipate that some amount of written discovery and/or supplementation of each party's written discovery responses will be necessary. The Parties are also currently working to identify and produce additional documents and ESI responsive to previously served requests to produce.

There are also a number of additional fact witness depositions yet to be taken in this matter. Plaintiff anticipates taking five additional fact witness depositions, including the deposition of former Sheriff Victor Hill. However, none of the fact witnesses Plaintiff seeks to depose are still employed by the Clayton County Sheriff's Office, which may present certain challenges in securing the

attendance of such witnesses for deposition. Plaintiff also seeks to take a corporate deposition under Fed. R. Civ. P. 30(b)(6). The Parties will agree on proposed topics in advance of such deposition. Defendant may seek to reopen Plaintiff's deposition for limited purposes to be agreed upon by the Parties in advance of such reopening, as well as the amount of time that Defendant may use to continue deposing Plaintiff.

The Parties will endeavor to resolve any remaining discovery disputes in good faith and informally and only intend to present narrowed disputes to the Court as a last resort.

Respectfully submitted, this 17th day of February, 2023.

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/s/ Ashley Wilson Clark

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_____)	

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, I electronically filed the foregoing **AMENDED DISCOVERY PLAN** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Jack Hancock
John D. Bennett
Kelli Spearman
FREEMAN MATHIS & GARY, LLP
Counsel for Defendant

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/s/ Ashley Wilson Clark

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